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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY
NO. 2:10-cv-1276-TAD-PAT	

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

* * * *

NICOLE THOMPSON,

Plaintiff,

vs.

TRW AUTOMOTIVE U.S. LLC, et al.

Defendants.

BY: _____
CASE NO. 2:09-cv-1375-JAD-PAL

DEPUTY

**AMENDED TRIAL STIPULATION
REGARDING PLAINTIFF'S
PREGNANCY AND DELIVERY**

9 The parties have reached certain agreements concerning medical expenses related to
10 Plaintiff's pregnancy and C-Section delivery and propose the following instruction be given to
11 the jury:

12 1. The parties have agreed that certain facts be placed in evidence as Exhibit
13 215. You should therefore treat the fact below as having been proved.

14 a. As a result of Plaintiff's carotid artery dissection and the stent placement, she
15 required the treatment described in Exhibit 215a, 215b and 215c.

16 2. Exhibit 215 includes medical records related to Plaintiff's pregnancy and C-
17 Section delivery.

18 a. The total cost of the treatment described in Exhibit 215 was \$11,606.00 (\$420
19 from Essential Women's Health [215a], \$3,186 from High Risk Pregnancy [215b] and \$8,000
20 from St. Rose Hospital [215c]). The charges for the treatment described in Exhibit 215 are
21 already included in Exhibit 25, which is a list of Plaintiff's medical bills.

22 3. However, in considering Exhibit 215:

23 a. You must still decide whether the non-deployment of the air bag legally caused,
24 as legal cause is defined by the Judge, Plaintiff's carotid artery dissections and any of the
25 treatment provided to Plaintiff as a result of the dissections, including without limitation
26 Plaintiff's pregnancy-related and C-section delivery related costs.

1 In addition to reading this instruction to the jury, the Parties agree that Exhibit 215 will
2 be admitted and will include identical language (paragraphs 1 through 3) at the beginning of the
3 Exhibit 215.

4 DATED this 25th day of August, 2014.

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7 IT IS SO ORDERED this 26th day of August, 2014.

8 
9 U.S. DISTRICT COURT JUDGE